

LULAC v. Abbott, 3:21-cv-259 (W.D. Tex.): Meet and Confer Regarding Privilege Log for Defendant State of Texas (June 16, 2022 Objections and Responses)

Kenneth Parreno

Tue 7/19/2022 10:11 AM

To: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; Courtney Corbello <Courtney.Corbello@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Ryan Kercher <Ryan.Kercher@oag.texas.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>;

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✉ 1 attachment

O&Rs - LULAC - 1st RFPs to Texas.pdf;

Good morning,

On May 17, 2022, LULAC Plaintiffs served their First Set of Requests for Production to Defendant the State of Texas. On June 16, 2022, counsel for the State of Texas served the attached Objections and Responses to LULAC Plaintiffs' First Set of Requests for Production, and stated that they "do not currently have any documents from the Office of the Attorney General that are non-privileged and responsive to LULAC Plaintiffs' requests." Under the Stipulated ESI Agreement, Dkt. 203 at 16, the State of Texas should have provided a privilege log by yesterday, July 18, 2022 in connection with the State's Objections and Responses. However, LULAC Plaintiffs have not yet received that privilege log.

Accordingly, this email constitutes an attempt to meet and confer on the missing privilege log from the State of Texas. Please ensure that a privilege log for the State of Texas is produced by July 22, 2022, so that LULAC Plaintiffs can assess the propriety of the privileges asserted by the State of Texas.

Thank you,  
Kenneth

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